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July 8, 2022

Via Electronic Filing

The Honorable Sarah L. Cave, U.S.M.J.
U.S. District Court
Southern District of New York
500 Pearl Street, Room 1670
New York, NY 10007

Re: *Volman v. Raj Mahal Rest. Inc. et al*
Case No.: 1:22-cv-03740-RA

Dear Honorable Magistrate Judge Cave:

This law firm represents Defendants Raj Mahal Rest. Inc. d/b/a Raj Mahal and 320-326 RO Village Realty LLC (together the “Defendants”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules I(A) and 1(E), this letter respectfully serves to request an extension of Defendants’ time to reply or otherwise respond to Plaintiff’s Complaint to, through and including, August 15, 2022.

This is the first request of its nature, and is made on consent of Plaintiff’s counsel.¹ If granted, this request would not affect any other scheduled deadlines.

The basis of the request is that the undersigned counsel has recently been engaged and requires additional time to gather information from Defendants to respond to the Complaint.

This letter further serves as a request to extend the parties’ joint letter submission deadline from July 10, 2022 to, through and including, August 15, 2022. This request is made jointly with Plaintiff’s counsel. The basis for this request is that the parties wish to engage in preliminary settlement discussions before deciding how to proceed with the litigation. If granted, this request would not affect any other scheduled deadlines.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

¹ Plaintiff’s counsel’s consent was conditioned on an acknowledgement from Defendants to waive any defenses to personal jurisdiction due to improper service of process.

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi
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VIA ECF: All Counsel

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'Ronnie Abrams', written over a horizontal line.

Hon. Ronnie Abrams

7/20/22